

# **Exhibit 34**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MONIQUE RUSSELL, JASMINE RIGGINS,  
ELSA M. POWELL AND DESIRE EVANS,

Plaintiffs

v.

EDUCATIONAL COMMISSION FOR  
FOREIGN MEDICAL GRADUATES,

Defendant

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Case No. 2:18-cv-05629-JW

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Hon. Joshua D. Wolson

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**DECLARATION OF ELSA POWELL**

I, Elsa Powell, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that the following is true and correct:

1. I first encountered Oluwafemi Igberase, whom I knew as “Dr. Charles Akoda,” in 2014, having been referred to the medical practice of Abdul Chaudry, M.D. for prenatal care. Oluwafemi Igberase, using the identity of “Charles Akoda,” saw me on several occasions during my pregnancy in connection with that medical practice. He also performed the delivery of my son, Jaiden.

2. Igberase’s treatment of me involved physical contact, including invasive pelvic examinations, and the delivery of my child. Additionally, following delivery of my child, Igberase performed a surgery on me as a result of significant postpartum bleeding.

3. During my pregnancy, Igberase acted in a flirtatious manner with me that made me feel uncomfortable, but I nevertheless trusted that he was a competent and appropriately credentialed physician providing appropriate medical care.

4. Throughout all procedures and examinations performed on me by Igberase, I believed that he had received all appropriate and necessary medical training and was practicing obstetrics and gynecology as a duly licensed and credentialed physician. I trusted the organizations responsible for verifying the credentials of physicians when I agreed to submit to medical care from him.

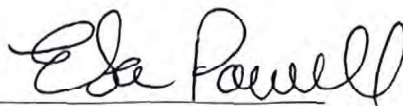
5. I first learned that the man I knew as “Dr. Akoda” had used a fraudulent identity and had not taken the appropriate steps to engage in the practice of medicine, in approximately 2018.

6. I trusted “Akoda” with my prenatal care, the delivery of my child, and subsequent surgical procedures. Upon learning that he had engaged in this fraud, I felt extremely violated, and experienced severe emotional distress. As a result of this realization, I experienced recurrent nausea, stomach discomfort, fear, confusion, sleeplessness, crying, anger, nervous sweating, and panic attacks. I experienced difficulty trusting physicians and reluctance to seek medical care. These symptoms were recurrent and severe, and continue to today, particularly when confronted with the need to see a medical provider. I felt betrayed by “Akoda” and the organizations responsible for verifying the qualifications of physicians.

7. I entrusted the man I knew as “Akoda” with my life and the life of my then unborn child. I allowed him to touch and perform invasive examinations of my body. Had I understood that the man I knew to be “Akoda” had engaged in identity fraud, and had not gone through the appropriate process to become credentialed as a physician, including by not submitting valid proof of having attended medical school, I would never have agreed to submit to medical and surgical treatment by him. His physical contact with me, including the delivery of my child, was obtained without my consent and through fraud.

I declare under the penalties of perjury of the laws of the United States of America that the foregoing is true and correct.

Date: 1/10/2022

By:   
Elsa Powell